

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

In re: NEXIUM (ESOMEPRAZOLE) ANTITRUST LITIGATION	MDL No. 2409  Civil Action No. 1:12-md-02409
This Document Relates To:  All Direct Purchaser Class Actions	

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED MOTION TO AMEND  
THE FORM OF NOTICE OF THE DIRECT PURCHASER CLASS SETTLEMENT  
WITH DR. REDDY'S LABORATORIES, LTD. AND DR. REDDY'S  
LABORATORIES, INC. ("DRL"), AND SCHEDULE FOR FINAL APPROVAL**

Direct Purchaser Class Plaintiffs respectfully move this Court to amend their previously-submitted proposed form of Notice of the DRL Settlement and proposed schedule for final approval (ECF No. 1140, 1141). DRL supports this motion, and no party opposes.

On January 18, 2015, this Court granted preliminary approval of the Direct Purchaser Class settlement with DRL. ECF No. 1478. On April 2, 2015, the Direct Purchaser Class Plaintiffs filed a motion for preliminary approval of their settlement with Teva Pharmaceutical Industries Ltd. and Teva Pharmaceuticals USA, Inc. (collectively, "Teva"), and supporting papers. ECF Nos. 1512, 1513.

To conserve costs and judicial resources, Direct Purchaser Class Plaintiffs respectfully request (a) permission to notify the Direct Purchaser Class of both the DRL and Teva settlements in a single notice, and (b) that this Court order a single schedule governing the approval deadlines for both settlements as follows:

Last day to finalize Settlement Notice	<b>Ten (10) days after the Court grants preliminary approval of the Teva Settlement</b>
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Last day for the Notice Administrator to complete mailing of the Notice of Direct Purchaser Class Plaintiff Settlements with DRL and Teva	<b>Fourteen (14) days after the Court grants preliminary approval of the Teva Settlement</b>
Deadline for Direct Purchaser Class Members to Object to the Settlements	<b>Forty-five (45) days following mailing of the Settlement Notice to the Direct Purchaser Class</b>
Last day for Direct Purchaser Class Plaintiffs to Move for Final Approval of their Settlements with DRL and Teva	<b>Thirty (30) days after the deadline for Direct Purchaser Class Members to Object to the Settlement</b>
Final Approval Hearing	<b>At a date and time at the convenience of the Court (no earlier than ninety (90) days after mailing of the Settlement Notice is complete)</b>

The proposed amended form of notice informing the Direct Purchaser Class of both the DRL and Teva settlements has been filed as ECF No. 1513-2 (Exhibit A to the Declaration of Rebecca A. Blake).

A proposed order granting these requests accompanies this Motion.

Dated: April 6, 2015

**/s/ Bruce E. Gerstein**

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**CERTIFICATE OF SERVICE**

I, Bruce E. Gerstein, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: April 6, 2015

**/s/ Bruce E. Gerstein**  
Bruce E. Gerstein